

# **EXHIBIT A**

**ALLEGATIONS IN THE OPERATIVE COMPLAINTS**  
**AGAINST THE BINLADIN DEFENDANTS**

**Ashton v. Al Qaeda, No. 02-CV-6977 (“Ashton 6AC”)**

<b>BAKR BINLADIN</b>
<ul style="list-style-type: none"><li>• Bakr Binladin, son of Mohammed Bin Laden and brother of OBL, runs SBG. (¶ 397)</li><li>• On MBC’s board of directors. (¶ 409)</li><li>• Was an investor and account holder in Bank Al Taqwa. (¶ 388)</li></ul>

**ALLEGATIONS IN THE OPERATIVE COMPLAINTS**  
**AGAINST THE BINLADIN DEFENDANTS**

**Burnett v. Al Baraka, No. 03-CV-5738 (“Burnett NY Compl.”)**

**BAKR BINLADIN**

- Bakr Binladin, son of Mohammed Bin Laden, runs SBG. (¶ 313)
- On MBC’s board of directors. (¶ 325)
- Co-owns Binladin for Contracting and Trading. (¶ 144)

**OMAR BINLADIN**

- On SBG’s board of directors. (¶ 313)
- On MBC’s board of directors. (¶ 325)

**TARIQ BINLADIN**

- On SBG’s board of directors. (¶ 313)
- On MBC’s board of directors. (¶ 325)
- In the early 1990s, served as the “general supervisor” of the IIRO, a charity that allegedly has materially supported al Qaeda. (¶ 326)
- Had a “prominent role” in 1990 at the IIRO. (¶ 327)
- In 1990, had been a member of the IIRO for ten years, during which he “ha[d] been working quietly for the orphans and the immigrants in the Islamic world.” (¶ 327)

**ALLEGATIONS IN THE OPERATIVE COMPLAINTS**  
**AGAINST THE BINLADIN DEFENDANTS**

**Continental Casualty v. Al Qaeda, No. 04-CV-5970 (“Contin. Cas. 1AC”)**

<b>BAKR BINLADIN</b>
<ul style="list-style-type: none"><li>• Bakr Binladin, son of Mohammed Bin Laden, runs SBG. (¶ 334)</li><li>• On MBC’s board of directors. (¶ 345)</li><li>• Co-owns Binladin for Contracting and Trading. (¶ 525)</li></ul>
<b>OMAR BINLADIN</b>
<ul style="list-style-type: none"><li>• On MBC’s board of directors. (¶ 345)</li></ul>
<b>TARIQ BINLADIN</b>
<ul style="list-style-type: none"><li>• On SBG’s board of directors. (¶ 334)</li><li>• On MBC’s board of directors. (¶ 345)</li><li>• In the early 1990s, served as the “general supervisor” of the IIRO, a charity that allegedly has materially supported al Qaeda. (¶ 346)</li><li>• Had a “prominent role” in 1990 at the IIRO. (¶ 347)</li><li>• In 1990, had been a member of the IIRO for ten years, during which he “ha[d] been working quietly for the orphans and the immigrants in the Islamic world.” (¶ 347)</li></ul>
<b>BINLADIN GROUP INTERNATIONAL COMPANY LTD. (“BGI”)</b>
<ul style="list-style-type: none"><li>• The agreement for the construction of the Port Sudan airport was between the Sudanese government and Saudi Bin Laden International Company. (¶ 340)</li></ul>

**ALLEGATIONS IN THE OPERATIVE COMPLAINTS**  
**AGAINST THE BINLADIN DEFENDANTS**

**Euro Brokers v. Al Baraka, No. 04-CV-7279 (“Euro Brokers Compl.”)**

<b>BAKR BINLADIN</b>
<ul style="list-style-type: none"><li>• (NONE)</li></ul>
<b>OMAR BINLADIN</b>
<ul style="list-style-type: none"><li>• (NONE)</li></ul>
<b>TARIQ BINLADIN</b>
<ul style="list-style-type: none"><li>• (NONE)</li></ul>

**ALLEGATIONS IN THE OPERATIVE COMPLAINTS**  
**AGAINST THE BINLADIN DEFENDANTS**

**Federal Insurance v. Al Qaida, No. 03-CV-6978 (“Fed. Ins. 1AC”)**

**BAKR BINLADIN**

- Bakr Binladin, brother of OBL, runs SBG. (§ 381)
- Is the head of SBG. Under his control, SBG “provided substantial material support” to al Qaida. (§ 505)
- “[H]as made substantial contributions to many of the charities operating within al Qaida’s infrastructure.” Made these contributions with “full knowledge that the contributed funds would be used to support al Qaida’s operations and terrorist attacks.” (§ 505)
- One of the largest single donors to a 1992 fundraiser for the IIRO, which raised 19 million Saudi Riyals for Bosnian relief efforts. (§ 505)
- “[H]as long provided material support” to al Qaida “[t]hrough his various for-profit enterprises and involvement with charities and individuals operating within al Qaida’s infrastructure.” (§ 506)
- “[I]dentified in the Golden Chain” as one of al Qaida’s “principal sponsors.” (§§ 101, 505)
- He, along with numerous other defendants, “aided and abetted, conspired with, and provided material support and resources to, defendant al Qaida and/or affiliated FTOs, associations, organizations or persons, as described herein.” (§ 66)

**OMAR BINLADIN**

- On SBG’s board of directors. (§ 381)
- He, along with numerous other defendants, “aided and abetted, conspired with, and provided material support and resources to, defendant al Qaida and/or affiliated FTOs, associations, organizations or persons, as described herein.” (§ 66)

**TARIQ BINLADIN**

- On SBG’s board of directors. (§ 381)
- He, along with numerous other defendants, “aided and abetted, conspired with, and provided material support and resources to, defendant al Qaida and/or affiliated FTOs, associations, organizations or persons, as described herein.” (§ 66)

**MOHAMMAD BINLADIN COMPANY (“MBC”)**

- Along with SBG, “provided technical assistance” on “projects undertaken by [OBL] and al Qaida in the Sudan...including the construction of major roads and the Port of Sudan airport.” (§ 367)
- It, along with numerous other defendants, “aided and abetted, conspired with, and provided material support and resources to, defendant al Qaida and/or affiliated FTOs, associations, organizations or persons, as described herein.” (§ 66)

**ALLEGATIONS IN THE OPERATIVE COMPLAINTS**  
**AGAINST THE BINLADIN DEFENDANTS**

**New York Marine v. Al Qaida, No. 04-CV-6105 (“NY Marine 2AC”)**

**BAKR BINLADIN**

- Bakr Binladin, brother of OBL, runs SBG. (¶ 354)
- Is the head of SBG. Under his control, SBG “provided substantial material support” to al Qaida. (¶ 469)
- “[H]as made substantial contributions to many of the charities operating within al Qaida’s infrastructure.” Made these contributions with “full knowledge that the contributed funds would be used to support al Qaida’s operations and terrorist attacks.” (¶ 469)
- One of the largest single donors to a 1992 fundraiser for the IIRO, which raised 19 million Saudi Riyals for Bosnian relief efforts. (¶ 469)
- “[H]as long provided material support” to al Qaida “[t]hrough his various for-profit enterprises and involvement with charities and individuals operating within al Qaida’s infrastructure.” (¶ 470)
- “[I]dentified in the Golden Chain” as one of al Qaida’s “principal sponsors.” (¶¶ 80, 469)
- He, along with numerous other defendants, “aided and abetted, conspired with, and provided material support and resources to, defendant al Qaida and/or affiliated FTOs, associations, organizations or persons.” (¶ 45)

**OMAR BINLADIN**

- On SBG’s board of directors. (¶ 354)
- He, along with numerous other defendants, “aided and abetted, conspired with, and provided material support and resources to, defendant al Qaida and/or affiliated FTOs, associations, organizations or persons.” (¶ 45)

**TARIQ BINLADIN**

- On SBG’s board of directors. (¶ 354)
- He, along with numerous other defendants, “aided and abetted, conspired with, and provided material support and resources to, defendant al Qaida and/or affiliated FTOs, associations, organizations or persons.” (¶ 45)

**MOHAMMAD BINLADIN COMPANY (“MBC”)**

- Along with SBG, “provided technical assistance” on “projects undertaken by [OBL] and al Qaida in the Sudan...including the construction of major roads and the Port of Sudan airport.” (¶ 340)
- It, along with numerous other defendants, “aided and abetted, conspired with, and provided material support and resources to, defendant al Qaida and/or affiliated FTOs, associations, organizations or persons.” (¶ 45)

**ALLEGATIONS IN THE OPERATIVE COMPLAINTS**  
**AGAINST THE BINLADIN DEFENDANTS**

**World Trade Center v. Al Baraka, No. 04-CV-7280 (“WTC Compl.”)**

**BAKR BINLADIN**

- Bakr Binladin, son of Mohammed Bin Laden, runs SBG. (¶ 624)
- On MBC’s board of directors. (¶ 638)
- Executive Board Member of Binladin Group International. (¶ 657)
- Co-owns Binladin for Contracting and Trading. (¶ 281)
- Was one of the largest single donors to a July 1992 fundraising drive in Jeddah for the Muslims of Bosnia sponsored by Sanabel Al-Kheer and the IIRO. (¶ 390)

**OMAR BINLADIN**

- On SBG’s board of directors. (¶ 624)
- On MBC’s board of directors. (¶ 638)
- Executive Board Member of Binladin Group International. (¶ 657)

**TARIQ BINLADIN**

- On SBG’s board of directors. (¶ 624)
- On MBC’s board of directors. (¶ 638)
- In the early 1990s, served as the “general supervisor” of the IIRO, a charity that allegedly has materially supported al Qaeda. (¶ 639)
- Had a “prominent role” in 1990 at the IIRO. (¶ 640)
- In 1990, had been a member of the IIRO for ten years, during which he “ha[d] been working quietly for the orphans and the immigrants in the Islamic world.” (¶ 640)